

## UNITED STATES DISTRICT COURT

## WESTERN DISTRICT OF TEXAS

## EL PASO DIVISION

USA

vs.

(1) Napoleon Anibal Campos Jr.

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§  
§

NO: EP:23-CR-00656(1)-DCG

## DEFENDANT'S MOTION FOR ADMINISTRATIVE SETTING

## \*\*IN LIEU OF APPEARANCE AT DOCKET CALL\*\*

\*\*See Court's Instruction #1 \*\*

## TO THE HONORABLE UNITED STATES DISTRICT COURT JUDGE

Comes now, undersigned counsel for the Defendant, (1) Napoleon Anibal Campos Jr., on this day and respectfully moves the Court to grant Counsel leave to enter this appearance administratively and in lieu of appearing at the Docket Call scheduled for Wednesday, May 3, 2023 at 1:30 PM, and in support of said Motion shows the Court as follows:

- SAB 1. Counsel, having previously requested or obtained 0 Continuances, moves for Continuance of the Docket Call because of the need for investigation, plea negotiations, and/or preparation of the defense due to complex discovery issues in the case. Counsel further avers that the interest of justice outweighs the interest of the Defendant and the public in a speedy trial and agree that the timing from the scheduled docket calls through the next docket call, is excludable time within the meaning of the Speedy Trial Act, 18 U.S.C. §§3161 *et seq.*
- \_\_\_\_\_ 2. The Defendant moves to have the above styled and numbered cause set for a Plea Hearing and states that said Plea Hearing may be referred to the United States Magistrate. The Defendant requests the plea be set \_\_\_\_\_ ASAP, in \_\_\_\_\_ 2 weeks, in \_\_\_\_\_ 3 weeks. (The Plea Hearing date may NOT be scheduled after the Court's next regularly scheduled Docket Call date.)
- \_\_\_\_\_ 3. The Defendant announces "Ready for Trial" and moves to have the above styled and numbered cause set for a Trial on the merits at the Court's convenience.
- \_\_\_\_\_ 4. This Motion is filed not later than two (2) business days prior to the scheduled Docket Call.

Respectfully submitted,

Sherilyn Bunn (signature)

Sherilyn Bunn (typed or printed name)

Defense Counsel for Napoleon Anibal Campos Jr.

Napoleon Anibal Campos Jr. (typed or printed name)  
Defendant

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the above Motion was served upon opposing counsel, UNITED STATES ATTORNEY'S OFFICE by facsimile or electronically filed with the Clerk of the Court using the CM/ECF System which will transmit notification of such filing to the following CM/ECF participant, in accordance with the Federal Rules of Criminal Procedure on the 17th day of April, 2023.

Sheryl Beene  
Defense Attorney